

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 17-CR-00011-LRR
	)	
vs.	)	
	)	
FADI YASSINE,	)	
	)	
Defendant.	)	

**SENTENCING MEMORANDUM**

The United States submits the following information regarding the upcoming sentencing hearing in this matter:

**I. WITNESSES**

The United States anticipates it may call the following witnesses:

- A. Chris Cantrell, HSI Special Agent
- B. Tim Hunt, ATF Special Agent

**II. EXHIBITS**

The United States will offer the following exhibits:

1. List of Recovered Guns by Date of Recovery
2. List of Known Gun Purchases by Name of Purchaser
3. Facebook messages

### III. CONTESTED ISSUES

The government anticipates the Court may need to resolve the following issues at sentencing:

1. Number of Firearms, PSR ¶ 44, USSG §2K2.1(b)(1);
2. Enhancement for possessing or transferring firearm(s) with knowledge, intent or reason to believe firearm(s) would be transported out of the United States, PSR ¶ 44, USSG §2K2.1(b)(6)(A);
3. Upward Departure or Variance Based Upon Number of Guns, PSR ¶ 120, (USSG § 2K2.1, comment. (n.13(C));
4. Defendant's Motions for Downward Departure/Variance, PSR ¶ 120, USSG §§ 5H1.6, 5K2.0.

A brief in support is attached.

#### CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2017, I electronically filed the foregoing with the Clerk of Court using the ECF system which will send notification of such filing to the parties or attorneys of record.

UNITED STATES ATTORNEY

BY: /s/lsm

cc: Angela Campbell

Respectfully submitted,

SEAN R. BERRY  
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